

Phyllis A. Jones, *pro hac vice*  
COVINGTON & BURLING LLP  
One CityCenter  
850 Tenth Street, NW  
Washington, DC 20001-4956  
Telephone: + 1 (202) 662-6000  
Facsimile: + 1 (202) 662-6291  
Email: pajones@cov.com

*Attorneys for Defendants Meta Platforms, Inc. f/k/a  
Facebook, Inc.; Facebook Holdings, LLC; Facebook  
Operations, LLC; Facebook Payments, Inc.;  
Facebook Technologies, LLC; Instagram, LLC;  
Siculus, Inc.; and Mark Elliot Zuckerberg*

*Additional parties and counsel listed on  
signature pages*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION**

IN RE: SOCIAL MEDIA ADOLESCENT  
ADDICTION/PERSONAL INJURY  
PRODUCTS LIABILITY LITIGATION

THIS DOCUMENT RELATES TO:

ALL ACTIONS

MDL No. 3047

Case No. 4:22-md-03047-YGR-PHK

Honorable Yvonne Gonzalez Rogers

**DEFENDANTS' STATEMENT OF  
RECENT DECISION**

1 Pursuant to Civil L.R. 7–3(d)(2), Defendants submit a copy of the judicial opinion issued in  
2 *Lama v. Meta Platforms, Inc.*, No. 3:23-cv-0462 (N.D.N.Y. May 6, 2024). The opinion is relevant to  
3 the Section 230 failure-to-warn arguments in Meta’s Motion to Dismiss the Multistate Attorneys  
4 General Complaint; Florida Attorney General Complaint; and Personal Injury Plaintiffs’ Consumer  
5 Protection and Misrepresentation Claims (Dkt. 517), in Defendants’ Joint Motion to Dismiss Pursuant  
6 to Rule 12(b)(6) Plaintiffs’ Non-Priority Claims (Counts 5, 12, 14, 16–18) (Dkt. 516), and in  
7 Defendants’ Joint Motion to Dismiss Pursuant to Rule 12(b)(6) the School District and Local  
8 Government Entities’ Master Complaint (Dkt. 601). The opinion was issued on May 6, 2024, after  
9 Defendants’ replies in support of the aforementioned motions were filed.

Dated: May 8, 2024

Respectfully submitted,

**COVINGTON & BURLING LLP**

/s/ Phyllis A. Jones

Mark W. Mosier, *pro hac vice*

mmosier@cov.com

Paul W. Schmidt, *pro hac vice*

pschmidt@cov.com

Phyllis A. Jones, *pro hac vice*

pajones@cov.com

Christian J. Pistilli, *pro hac vice forthcoming*

cpistilli@cov.com

COVINGTON & BURLING LLP

One CityCenter

850 Tenth Street, NW

Washington, DC 20001-4956

Telephone: + 1 (202) 662-6000

Facsimile: + 1 (202) 662-6291

Emily Johnson Henn (State Bar No. 269482)

ehenn@cov.com

COVINGTON & BURLING LLP

3000 El Camino Real

5 Palo Alto Square, 10th Floor

Palo Alto, CA 94306

Telephone: + 1 (650) 632-4700

Facsimile: +1 (650) 632-4800

*Attorneys for Defendants Meta Platforms, Inc. f/k/a*

*Facebook, Inc.; Facebook Holdings, LLC;*

*Facebook Operations, LLC; Facebook Payments,*

*Inc.; Facebook Technologies, LLC; Instagram,*

*LLC; Siculus, Inc.; and Mark Elliot Zuckerberg*

**KING & SPALDING LLP**

/s/ Geoffrey M. Drake

Geoffrey M. Drake, *pro hac vice*

gdrake@kslaw.com

Albert Q. Giang (State Bar No. 224332)

agiang@kslaw.com

David Mattern, *pro hac vice*

dmattern@kslaw.com

King & Spalding LLP

1180 Peachtree Street, NE, Suite 1600

Atlanta, GA 30309

Telephone: + 1 (404) 572-4600

Facsimile: + 1 (404) 572-5100

**FAEGRE DRINKER LLP**

/s/ Andrea Roberts Pierson

Andrea Roberts Pierson, *pro hac vice*

andrea.pierson@faegredrinker.com

Amy Fiterman, *pro hac vice*

amy.fiterman@faegredrinker.com

Faegre Drinker LLP

300 N. Meridian Street, Suite 2500

Indianapolis, IN 46204

Telephone: + 1 (317) 237-0300

Facsimile: + 1 (317) 237-1000

*Attorneys for Defendants TikTok Inc., ByteDance Inc., ByteDance Ltd., TikTok Ltd., and TikTok LLC*

**MUNGER, TOLLES & OLSON LLP**

*/s/ Jonathan H. Blavin*

Jonathan H. Blavin (State Bar No. 230269)

Jonathan.Blavin@mto.com

MUNGER, TOLLES & OLSON LLP

560 Mission Street, 27th Floor

San Francisco, CA 94105-3089

Telephone: (415) 512-4000

Facsimile: (415) 512-4077

Rose L. Ehler (State Bar No. 296523)

Rose.Ehler@mto.com

Victoria A. Degtyareva (State Bar No. 284199)

Victoria.Degtyareva@mto.com

Ariel T. Teshuva (State Bar No. 324238)

Ariel.Teshuva@mto.com

MUNGER, TOLLES & OLSON LLP

350 South Grand Avenue, 50th Floor

Los Angeles, CA 90071-3426

Telephone: (213) 683-9100

Facsimile: (213) 687-3702

Lauren A. Bell, *pro hac vice*

Lauren.Bell@mto.com

MUNGER, TOLLES & OLSON LLP

601 Massachusetts Ave., NW,

Suite 500 E

Washington, D.C. 20001-5369

Telephone: (202) 220-1100

Facsimile: (202) 220-2300

*Attorneys for Defendant Snap Inc.*

**WILSON SONSINI GOODRICH & ROSATI  
Professional Corporation**

*/s/ Brian M. Willen*

---

Brian M. Willen, *pro hac vice*

bwillen@wsgr.com

Wilson Sonsini Goodrich & Rosati

1301 Avenue of the Americas, 40th Floor

New York, New York 10019

Telephone: (212) 999-5800

Facsimile: (212) 999-5899

Lauren Gallo White (State Bar No. 309075)

lwhite@wsgr.com

Carmen Sobczak (State Bar No. 342569)

csobczak@wsgr.com

Wilson Sonsini Goodrich & Rosati

One Market Plaza, Spear Tower, Suite 3300

San Francisco, CA 94105

Telephone: (415) 947-2000

Facsimile: (415) 947-2099

Christopher Chiou (State Bar No. 233587)

cchiou@wsgr.com

Matthew K. Donohue (State Bar No. 302144)

mdonohue@wsgr.com

Wilson Sonsini Goodrich & Rosati

633 West Fifth Street

Los Angeles, CA 90071-2048

Telephone: (323) 210-2900

Facsimile: (866) 974-7329

*Attorneys for Defendants YouTube LLC,  
Google LLC, and Alphabet Inc.*

**ATTESTATION**

I, Phyllis A. Jones, hereby attest, pursuant to N.D. Cal. Civil L.R. 5–1, that the concurrence to the filing of this document has been obtained from each signatory hereto.

DATED: May 8, 2024

By: /s/ Phyllis A. Jones  
Phyllis A. Jones